### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware corporation,

Plaintiff,

v.

C.A. No. 04-1371 JJF

FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., a Delaware corporation, and FAIRCHILD SEMICONDUCTOR CORPORATION, a Delaware corporation,

Defendants.

#### **DECLARATION OF ROBERT BLAUSCHILD**

- I, Robert Blauschild, declare as follows:
- I have been asked to give expert opinions and testimony regarding Power 1. Integrations, Inc.'s ("Power Integrations") U.S. Patent Nos. 6,229,366 B1 ("the '366 patent"), 6,249,876 B1 ("the '876 patent"), and 6,107,851 ("the '851 patent"), collectively the "circuit patents."
- I provided testimony and opinions in expert reports, depositions, and 2. during the jury trials in this matter that the Power Integrations circuit patents are valid and are infringed by certain Fairchild PWM controller products. More specifically, the circuits in those products associated with the "soft start" and "frequency modulation" (also known as "frequency jitter") functions infringed one or more claims of the circuit patents.
- Fairchild has introduced additional PWM controller products that I did not 3. have the opportunity to evaluate earlier that include the relevant functions but which were not specifically discussed at the trial. Many of the products share similar part numbers and appear to be new versions of the same products already determined to infringe.

- Based on my review of publicly available information from Fairchild in 4. the form of data sheets, these new products appear to incorporate substantially the same circuits for performing soft start and frequency modulation as those already found to infringe. The representations of the functions and the circuits associated with them, in the form of block diagrams and text descriptions in the data sheets, are similar and in some cases substantially identical to the corresponding descriptions in the data sheets associated with the parts already found to infringe.
- Accordingly, based on my review of information available to me as of this 5. declaration, at least the following additional Fairchild products also infringe one or more of the asserted claims of the '366, '851 and/or '876 patents:

FAN7602B	FSDM101
FSDM0170RNB	FSCQ0170RNA
FSDM0270RNB	FSCQ0270RNA
FSDM0370RNB	FSCQ0370RNA
FSQ211	FSQ311
FSQ321L	
FSQ510H	
FSQ0165RL	
FSQ0265RL	
FSQ0365RL	
	FSDM0170RNB FSDM0270RNB FSDM0370RNB FSQ211 FSQ321L FSQ510H FSQ0165RL FSQ0265RL

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of October, 2007, at Redwood City, California.

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# **CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2007, I electronically filed with the Clerk of Court DECLARATION OF DECLARATION OF ROBERT BLAUSCHILD using CM/ECF which will send electronic notification of such filing(s) to the following counsel.

#### BY HAND DELIVERY

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Attorneys for Defendants FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC. and FAIRCHILD SEMICONDUCTOR CORPORATION, and third party INTERSIL CORPORATION

# BY E-MAIL AND FEDERAL EXPRESS

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Attorneys for Defendants FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC. and FAIRCHILD SEMICONDUCTOR **CORPORATION** 

> /s/ William J. Marsden, Jr. William J. Marsden, Jr.